

Hon. Michelle Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH SANT, MERTON CHUN,
RONESHA SMITH, and HEATHER
NICASTRO, individually and on behalf of all
others similarly situated

Plaintiffs,

vs.

ROCKETREACH LLC,

Defendant.

Case No. 2:24-cv-1626

STIPULATED MOTION TO EXTEND
DEADLINE TO RESPOND TO
COMPLAINT AND SET BRIEFING
SCHEDULE

STIPULATION

WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro (collectively, "Plaintiffs") filed Case No. 2:24-cv-1626 against RocketReach LLC ("Defendant") on October 8, 2024;

WHEREAS, Defendant was served with Plaintiffs' Complaint on October 23, 2024;

WHEREAS, Defendant's deadline to respond to Plaintiffs' Complaint is November 13, 2024;

WHEREAS, Defendant recently retained counsel, and to provide Defendant sufficient time to respond, the parties have agreed, subject to Court approval, to an extension of time to respond;

THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the deadline for Defendant to answer or otherwise respond to the Complaint to December 28, 2024.

1 This stipulation shall not operate as an admission of any factual allegation or legal conclusion, nor
2 shall it operate as a waiver or otherwise affect any right, defense, claim or objection by any party.

3 In the event Defendant files a response by motion, the parties further agree to extend the
4 response and reply deadlines as follows. The deadline for Plaintiffs' response to Defendant's
5 motion shall be February 11, 2025; and the deadline for Defendant's reply shall be March 13, 2025

6 Stipulated to this __ day of November, 2024.

7
8 Presented and stipulated to by:

9 NICK MAJOR LAW

10 By: /s/ Nick Major

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14 Email: nick@nickmajorlaw.com
15 *Of Attorneys for Plaintiffs*

16 HEDIN LLP

17 By: /s/ Tylser K. Somes

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22 *Of Attorneys for Plaintiffs*

23 Stipulated to by:

24 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

25 By: /s/ Patrick G. Lynch

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Attorneys for RocketReach LLC.

ORDER

IT IS SO ORDERED.

DATED this ____ day of November, 2024

HON. MICHELLE PETERSON
UNITED STATES DISTRICT JUDGE